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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
461 7 TH AVENUE MARKET, INC.,	:	Case No. 18-22671 (RDD)
	:	
Debtor.	:	
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**NOTICE OF OBJECTIONS TO APPLICATION PURSUANT TO RULE 2014(a) OF
THE FEDERAL RULES OF BANKRUPTCY PROCEDURE FOR AN ORDER UNDER
SECTIONS 327(e), 328(a) AND 330 OF THE BANKRUPTCY CODE AUTHORIZING
THE EMPLOYMENT AND RETENTION OF KIMM LAW FIRM AS SPECIAL
COUNSEL FOR THE DEBTOR AND DEBTOR-IN-POSSESSION**

Hon. Robert D. Drain
United States Bankruptcy Court for the Southern District of New York
300 Quarropas Street
White Plains, NY 10601

PLEASE TAKE NOTICE, that Delshah 461 Seventh Avenue, LLC hereby
interposes the following objections to the Debtor's application pursuant to Rule 2014(a) seeking,
inter alia, the retention of Kimm Law Firm as Special Counsel for the Debtor (Dkt. No. 6).

BASIS FOR OBJECTIONS

1. Delshah 461 Seventh Avenue, LLC (hereinafter "Landlord") is in receipt of a copy of the Debtor's bankruptcy petition and post-petition filings.
2. Review of the filings, and specifically, Dkt. No. 6, reveals numerous defects with the submission.
3. Merely by way of example, note that the debtor name and case number indicates the wrong debtor and index number.

4. Similarly, the recitation of “Background” (contained in paragraphs 2-6 of the Matera application) references an incorrect petition, lease, landlord, as well as other information.

5. The application submitted indicates that the entire recitation contained in Dkt. No. 6 relates to another matter, and not this case.

6. Review of the “Terms of Retention” similarly reveals reference to an unrelated matter having nothing to do with this case.

7. It should be apparent, from all of the foregoing, that the referenced Notice of Application is defective.

WHEREFORE, it is respectfully requested that inasmuch as the application is defective on its face, that the proposed order requested by the Debtor be rejected until such time as a proper application is made, and proper notice given of said application.

Dated: New York, New York
May 15, 2018

Respectfully submitted,

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